

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,	§	
et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	CIVIL ACTION NO. 5:21-CV-00844-XR
v.	§	(Consolidated Cases)
	§	
GREGORY W. ABBOTT, et al.,	§	
	§	
<i>Defendants.</i>	§	

**DEFENDANT HARRIS COUNTY DISTRICT ATTORNEY
KIM OGG’S RULE 26(a)(3)(A) DISCLOSURES**

Defendant Harris County District Attorney Ogg (“District Attorney Ogg”) submits her Federal Rule Civil Procedure 26(a)(3)(A) disclosures and pretrial materials.

I. The name and, if not previously provided, the address and telephone number of each witness-separately identifying those the party expects to present and those it may call if the need arises.

District Attorney Ogg may call the following witnesses if the need arises:

1. George Jordan, who may be contacted through the undersigned counsel.
2. District Attorney Ogg reserves the right to call any witness identified in the pretrial disclosures of any other party, including Private Plaintiffs, State Defendants, Intervenor Defendants, and the United States.
3. District Attorney Ogg reserves the right to supplement this list.

II. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

Deposition of Isabel Longoria – April 20, 2022
8:20-25, 9:22-10:5, 139:14-140:18

Deposition of Senator Carol Alvarado – October 6, 2022
11:11-12:14, 16:7-21, 190:14-25

III. The identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

District Attorney Ogg may offer the following exhibits if the need arises:

1. District Attorney Ogg's March 12, 2022 proposed non-participation stipulation.
2. OCA Plaintiffs' rejection of District Attorney Ogg's proposed non-participation stipulation via e-mail on March 14, 2022.
3. District Attorney Ogg's March 21, 2023 First Amended Responses to OCA Plaintiffs' Second Interrogatories.
4. District Attorney Ogg's March 17, 2023 Responses to the LULAC Plaintiffs' Discovery Requests.
5. Any written responses served by any other party in this action pursuant to Rules 33, 34, or 36 of the Federal Rules of Civil Procedure.
6. District Attorney Ogg reserves the right to use any document or exhibit identified by any other parties in this action.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
DISTRICT ATTORNEY KIM OGG,
IN HER OFFICIAL CAPACITY AS
HARRIS COUNTY DISTRICT
ATTORNEY**

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023, a true and correct copy of the foregoing document was served on all counsel of record by filing with the Court's CM/ECF system.

/s/ Eric J.R. Nichols

Eric J.R. Nichols